

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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ETTA CALHOUN, ON BEHALF OF HERSELF AND  
ALL OTHER PERSONS SIMILARLY SITUATED,

Civil Action No: 18-cv-01022 RCM

Plaintiff,

v.


INVENTION SUBMISSION CORPORATION D/B/A  
INVENTHELP, TECHNOSYSTEMS CONSOLIDATED  
CORP., TECHNOSYSTEMS SERVICE CORP.,  
WESTERN INVENTION SUBMISSION CORP.,  
UNIVERSAL PAYMENT CORPORATION,  
INTROMARK INCORPORATED, INNOVATION  
CREDIT CORP., ROBERT J. SUSA, THOMAS FROST,  
P.A., ABOVE BOARD DRAFTING, INC., JOHN DOE  
COMPANIES 1-10; JOE DOE INDIVIDUALS 1-10,

Defendants.  
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**MOTION FOR ADMISSION PRO HAC VICE**

Now comes Plaintiff Etta Calhoun, on behalf of herself and all other persons similarly situated,  
by and through counsel, and moves this Honorable Court for the Admission Pro Hac Vice of Julie  
Pechersky Plitt.

Dated: September 12, 2018

  
Julie Pechersky Plitt, Esq.\*  
Oxman Law Group, PLLC  
120 Bloomingdale Road, Suite 100  
White Plains, New York 10605  
(914) 422-3900 (914) 422-3636 (Fax)  
[jplitt@oxmanlaw.com](mailto:jplitt@oxmanlaw.com)

Respectfully submitted,

By: /s/ Stanley W. Greenfield  
Stanley W. Greenfield Bar ID  
Greenfield and Kraut  
1040 Fifth Avenue  
Pittsburgh, PA 15219  
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Attorneys for Plaintiff

\*Admission pro hac vice pending

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FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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Civil Action No: 18-0122

Plaintiff,

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CORP., TECHNOSYSTEMS SERVICE CORP.,  
WESTERN INVENTION SUBMISSION CORP.,  
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CREDIT CORP., ROBERT J. SUSA, THOMAS FROST,  
P.A., ABOVE BOARD DRAFTING, INC., JOHN DOE  
COMPANIES 1-10; JOE DOE INDIVIDUALS 1-10,

Defendants.  
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**DECLARATION OF JULIE PECHERSKY PLITT, ESQ.**

I, Julie Pechersky Plitt, am competent to state and declare the following based upon my personal knowledge.

1. I earned my Juris Doctor degree from New York University School of Law in 1998. I earned my Bachelor of Arts degree from the University of Pittsburgh in 1994. I am an active member in good standing of the New York bar (Bar # JP8607). I am admitted to practice before the United States District Courts for the Southern and Eastern Districts of New York. Attached hereto is a Certificate of Good Standing dated September 5, 2018.

2. Upon graduation from law school, I was awarded a federal clerkship with the Honorable Sylvia H. Rambo, United States District Court, Middle District of Pennsylvania. I clerked for Judge Rambo for one year. Prior to that, while still in law school, I served as a law

clerk / legal intern for The Honorable Timothy K. Lewis, former Judge for the United States Court of Appeals for the Third Circuit, in Pittsburgh Pennsylvania, during the summer of 1996.

3. In 2000, immediately following my clerkship with Judge Rambo, I worked at the New York, New York offices of the national law firm, Katten Muchin Rosenman LLP. In 2007, Katten elected me to Partner in the Litigation Department. In 2016, I joined Oxman Law Group PLLC, as counsel, located at 120 Bloomingdale Road, Suite 100, White Plains, New York 10605. My practice has always focused in large part on class action litigation.

4. Plaintiff Etta Calhoun would like me to represent her in this case and I believe that I am qualified to do so.

5. I am a registered user of the Western District of Pennsylvania ECF system.

6. I have read, know and understand the Local Rules of Court for the Western District of Pennsylvania.

7. I have never been disciplined by any bar or court.

8. I pledge to act in accordance with the law.

I declare under penalty of perjury that the foregoing is true and correct.

This the 12<sup>th</sup> day of September, 2018.

  
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JULIE PECHERSKY PLITT, ESQ.

**United States District Court**  
**Southern District of New York**

**Certificate of  
Good Standing**

I, Ruby J. Krajick, Clerk of this Court, certify that

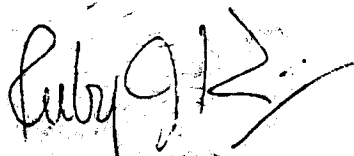
Julie Pechersky, Bar # JP8607

was duly admitted to practice in this Court on

02/08/2000, and is in good standing as a member of the Bar of this  
Court.

Dated at 300 Quarropas Street  
White Plains, New York

on September 5, 2018



Ruby J. Krajick  
Clerk

by Howie  
Deputy Clerk